

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: November 17, 2004

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Agency: CDPHE

Purpose of Contact: Disposition of Area 5 Survey Units 5 and 10

Discussion

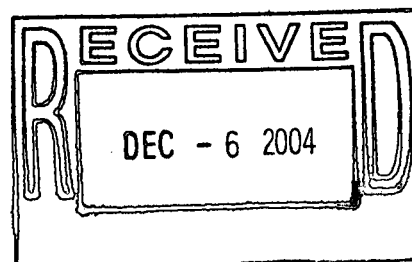
In accordance with the 776/777 DOP, Appendix I, the preparation of the facility for demolition is conducted in consultation with the CDPHE and is based on a series of decisions primarily related to maintaining releases to the environment and doses to the workers as low as reasonably achievable (ALARA). This contact record documents the activities that were conducted to prepare Area 5 Survey units 5 and 10 for demolition. Survey Unit 5 consisted of rooms 146, 146A and 146B. Survey Unit 10 consisted of the Room 127 basement (Room 001), and stairwell into the basement.

Area 5, like Area 3, had been substantially impacted by the fire, and it was anticipated that the remediation would be more difficult and decontamination results less effective. Survey unit 5, the Size Reduction Vault, was aggressively decontaminated through hydrolasing; however, the radiological levels in the survey unit were not substantially reduced. As a result, the walls and floor of this survey unit were removed through mechanical means, and there is not in process or final survey data to report. The soil under the unit is contaminated and will be marked for evaluation by Environmental Restoration during demolition and slab removal.

The size reduction vault was a RCRA interim status storage and treatment unit, unit 61. It also contained mixed residue tanks (Units 94.009 – 94.011). The tanks were closed by removal, and the secondary containment was closed through the debris rule when the area was hydrolased. The water associated with the hydrolasing was dispositioned as low level mixed waste.

The preparation process for Survey unit 10 was initiated May 3, 2004 when a package for in-process radiological surveys was prepared and executed. Once the surveys were complete, the following actions were taken as part of the ALARA-based decontamination effort:

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- Concrete shaving was performed on floor surfaces and stairway landing; manual chipping was used to remove hot spots.
- Specific bolts in the floor were removed.
- Specific kick plates on the stairs were remediated.
- The sump in the northwest corner of the basement was remediated through shaving

The area was resurveyed in accordance with the Radiological Pre-Demolition Survey Plan for Buildings 776/777. The surveys were provided to the CDPHE project representative, and a walk down of the area was conducted.

In addition to the radiological hazards, the non-radiological hazards have also been addressed in Survey Unit 10. The following summarizes the non-radiological activities:

- Survey Unit 10 contained RCRA unit 90.99, a mixed residue container storage unit that was closed July 28, 2004 through rinsing and negotiation with CDPHE.
- Chemicals and hazardous substances have been removed.
- Beryllium regulated and controlled areas have been closed. Survey Unit 10 covers the basement beneath the northeast corner of Room 127. Room 127, including the basement, was never listed on the historical list of rooms. The historical record indicates that T tanks located in room 127 were potentially beryllium contaminated internally. The final beryllium surveys for this area was collected on October 25, 2004. All samples collected were below the reporting limit of 0.1 ug/100 cm².
- Polychlorinated biphenyls (PCB) hazards and equipment have been removed.
- Asbestos has been abated.

Based on the survey results and the principles of ALARA, the risks (industrial and radiological) to the workers are greater than the benefit in source term reduction that would be gained through additional decontamination. The state project representative agrees that decontamination inside Survey unit 10 has progressed to the point of reasonably achievable removal and that the subsequent step of encapsulation is appropriate.

In summary, ALARA-based decontamination has been completed, Survey unit 10 will be encapsulated and surveyed for removable contamination, and controls will be applied during demolition. This contact record will be included as an appendix to the characterization report for Survey unit 10 and placed in the demolition file to ensure the controls and requirements are included in the demolition work packages for these survey units.

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